

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Anthony L. Mann,

Plaintiff,

vs.

Lt. C. Failey, Maj. Sharonda Sutton,
Capt. Wilson, Lt. Willie Simmons, Sgt.
Herman Wright, Sgt. Keith Moore, Cpl.
Otis Daniels, Cpl. Vincent Manley, Cpl.
Ray, Ofc. McNeal, Christian
Manganelli,

Defendants.

C/A No. 0:11-cv-2232-RMG

**SECOND AMENDED
DEFENDANTS'
EXHIBIT LIST**

**TO: XAVIER STARKES, ESQUIRE, AND STANLEY MYERS, ESQUIRE,
ATTORNEYS FOR PLAINTIFF:**

Pursuant to Local Rule 26.07, D.S.C., the Defendants hereby provide the following list of exhibits, which may be used in the trial of this case:

1. ~~SCDC Offender Summary for Anthony Mann (Plaintiff Objects)~~
2. ~~SCDC Record Summary Report for Anthony Mann (Plaintiff Objects)~~
- * ~~The Parties Stipulate that Plaintiff Mann's Post-Conviction Relief (PCR) Hearing occurred on November 14 and 18, 2011.~~
3. Color photo of Anthony Mann's Cell (1);
4. Color photo of Anthony Mann's Cell (2);
5. Color photo of Anthony Mann's Cell (3);
6. Color photo of Anthony Mann's Cell (4);
7. Color photo of Anthony Mann's Cell (5);
8. Color photo of Anthony Mann's Cell (6);
9. Color photo of Anthony Mann's Cell (7);
10. Color photo of Anthony Mann's Cell (8);
11. Color photo of Anthony Mann's Cell (9);
12. Color photo of Anthony Mann's Cell (10);
13. Color photo of Anthony Mann's Cell (11);
14. Color photo of Anthony Mann's Cell (12);
15. Color photo of Anthony Mann's Cell (13);
16. Color photo of Anthony Mann's Cell (14);
17. Color photo of Anthony Mann's Cell (15);

18. Color photo of Anthony Mann's Cell (16);
19. Color photo of Anthony Mann's Cell (17)(Corrected);
20. Color photo of Anthony Mann's Cell (18)(Corrected);
21. SCDC Medical Summary for Anthony Mann, encounter date on October 01, 2010 (The parties have stipulated to the introduction of these records);
22. SCDC Medical Summary for Anthony Mann, encounter dates from December 1, 2009 through August 24, 2010 (The parties have stipulated to the introduction of these records);
23. SCDC MIN Notes for June 9, 2010 Incident;
24. SCDC MIN Notes for June 15, 2010 Incident;
25. SCDC MIN Notes for July 28, 2010 Incident;
- ~~26. SCDC MIN Notes for August 5, 2010 Incident; Withdrawn;~~
27. SCDC MIN Notes for August 23, 2010 Incident;
28. SCDC Inmate Grievance August 29, 2010;
- ~~29. Warden's response to Inmate Grievance December 21, 2010;~~
30. SCDC Request to Staff July 1, 2010;
31. SCDC Incident Report from June 9, 2010 by Sgt. R Williams;
32. SCDC Report on the Use of Force from June 9, 2010 by Sgt. R. Williams;
33. SCDC Incident Report from June 16, 2010 by Ricky D. Bunch;
34. SCDC Incident Report from June 14, 2010 by Sgt. Williams;
35. SCDC Incident Report of August 23, 2010 by Sgt. Moore;
36. SCDC Incident Report of August 23, 2010 by Sgt. Wright;
37. SCDC Incident Report August 23, 2010 by Lt. Willie Simmons;
38. SMU Institutional Classification Committee Review August 27, 2010;
39. Incident Report of July 29, 2010 by Lt. Failey;
- ~~40. SCDC Incident Report and Disciplinary Records from December 23, 2009 by Lt. J. Langenstein (Plaintiff Objects);~~
- ~~41. SCDC Incident Report from December 23, 2009 by Ofc. S. Nichols (Plaintiff Objects);~~
- ~~42. SCDC Incident Report from December 23, 2009 by A. Stafford (Plaintiff Objects);~~
- ~~43. SCDC Incident Report from December 23, 2009 by Sgt. E. Lumpkins (Plaintiff Objects);~~
- ~~44. SCDC Incident Report from December 23, 2009 by Ofc. B. Helmuth (Plaintiff Objects);~~
- ~~45. Photograph of homemade handcuff Key used in December 23, 2009 escape attempt (Plaintiff Objects);~~
- ~~46. SCDC Incident Report from February 23, 2010 by M. Bodison (Plaintiff Objects);~~
47. SCDC Staff Memoranda;
- ~~48. Properties Print out for Attempted Recorded Video from August 23, 2010; Withdrawn;~~
49. SCDC Photos 2.11.16 000001 (Stipulated)
50. SCDC Photos 2.11.16 000002 (Stipulated)
51. SCDC Photos 2.11.16 000003 (Stipulated)
52. SCDC Photos 2.11.16 000004 (Stipulated)
53. SCDC Photos 2.11.16 000005 (Stipulated)
54. SCDC Photos 2.11.16 000006 (Stipulated)
55. SCDC Photos 2.11.16 000007 (Stipulated)
56. SCDC Photos 2.11.16 000008 (Stipulated)
57. SCDC Photos 2.11.16 000009 (Stipulated)
58. SCDC Photos 2.11.16 000010 (Stipulated)

59. SCDC Photos 2.11.16 000011 (Stipulated)
60. SCDC Photos 2.11.16 000012 (Stipulated)
61. SCDC Photos 2.11.16 000013 (Stipulated)
62. SCDC Photos 2.11.16 000014 (Stipulated)
63. SCDC Photos 2.11.16 000015 (Stipulated)
64. SCDC Photos 2.11.16 000016 (Stipulated)
65. SCDC Photos 2.11.16 000017 (Stipulated)
66. SCDC Photos 2.11.16 000018 (Stipulated)
67. SCDC Photos 2.11.16 000019 (Stipulated)
68. SCDC Photos 2.11.16 000020 (Stipulated)
69. SCDC Photos 2.11.16 000021 (Stipulated)
70. SCDC Photos 2.11.16 000022 (Stipulated)
71. SCDC Photos 2.11.16 000023 (Stipulated)
72. SCDC Photos 2.11.16 000024 (Stipulated)
73. SCDC Photos 2.11.16 000025 (Stipulated)
74. SCDC Photos 2.11.16 000026 (Stipulated)
75. SCDC Photos 2.11.16 000027 (Stipulated)
76. SCDC Photos 2.11.16 000028 (Stipulated)
77. SCDC Photos 2.11.16 000029 (Stipulated)
78. SCDC Photos 2.11.16 000030 (Stipulated)
79. SCDC Photos 2.11.16 000031 (Stipulated)
80. SCDC Photos 2.11.16 000032 (Stipulated)
81. SCDC Photos 2.11.16 000033 (Stipulated)
82. SCDC Photos 2.11.16 000034 (Stipulated)
83. SCDC Photos 2.11.16 000035 (Stipulated)
88. Affidavit of Anthony Mann from August 28, 2012

Defendants also provide the following list of potential exhibits, which Defendants may use if the need arises, such as for purposes of impeachment or depending on what evidence is admitted in the Plaintiff's case:

84. SCDC Medical Summary for Anthony Mann, encounter dates from February 14, 2011 through November 10, 2011;
85. Printout of Facebook Page for Anthony Mann dated December 6, 2011 (Plaintiff Objects);
86. Affidavit of Anthony Mann from June 16, 2010 (Plaintiff Objects);
87. Affidavit of Anthony Mann from August 28, 2012 (Different one, 171-34) (Plaintiff Objects);
88. Affidavit of Anthony Mann from August 28, 2012 (Plaintiff Objects);
89. Affidavit of Anthony Mann from August 28, 2012 (171-31) (Plaintiff Objects);
90. Affidavit of Anthony Mann from September 12, 2010 (Plaintiff Objects);
91. Affidavit of Anthony Mann from November 4, 2010 (Plaintiff Objects);
92. Affidavit of Anthony Mann from November 9, 2010 (Plaintiff Objects);
93. Declaration of Anthony Mann from October 29, 2012 (Plaintiff Objects);
94. Request to Staff from Anthony Mann on March 16, 2010 (Plaintiff Objects);
95. Request to Staff from Anthony Mann on May 7, 2010 (Plaintiff Objects);
96. Request to Staff from Anthony Mann on May 3, 2010 (Plaintiff Objects);

- ~~97. Request to Staff from Anthony Mann on June 13, 2010;~~
~~98. Request to Staff from Anthony Mann on August 17, 2010;~~
~~99. Request to Staff from Anthony Mann on September 20, 2010 to Dr. Sampson;~~
~~100. Request to Staff by Anthony Mann from November 2, 2010;~~
~~101. Anthony Mann Sick Call/Dental Request from December 12, 2010;~~

~~Defendants hereby provide the following list of Additional Exhibits, which may be used in the trial of this case. Defendants have provided these to Plaintiff's counsel and are awaiting response as to whether any objection exists:~~

102. SCDC Report on the Use of Force from August 23, 2010 by Ofc. C. Manganelli;
103. SCDC Report on the Use of Force from August 23, 2010 by Cpl. V. Manley;
104. SCDC Report on the Use of Force from August 23, 2010 by Ofc. McNeal;
105. SCDC Report on the Use of Force from August 23, 2010 by Ofc. S. Cook;
106. SCDC Report on the Use of Force from August 23, 2010 by Sgt. K. Moore;
107. CD's

Respectfully submitted,

/s/ Janet Brooks Holmes

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